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*Interim Co-Lead Class Counsel for  
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*[Additional Counsel Appear on Signature  
Page]*

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

*In re: Illuminate Education Data  
Security Incident Litigation*

Case No. 8:22-cv-1164-JVS-ADS

Class Action

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO  
MODIFY SCHEDULE**

**TO THE ABOVE ENTITLED COURT AND TO ALL PARTIES AND THEIR  
COUNSEL OF RECORD:**

The parties, Plaintiffs in the above matter, Anastasiya Kisil, Lucas Cranor, Kristen Weiland, Tara Chambers, Janene Vitro and Lorraine Deniz (collectively the “Plaintiffs”), by and through their attorneys, and defendant Illuminate Education, Inc. (“Illuminate” or “Defendant”), hereby stipulate as follows:

WHEREAS, on August 11, 2022, this Court issued an Order granting the Parties Stipulated Request to Continue Current Deadlines in anticipation of Plaintiffs’ motion to consolidate (Dkt. No. 43). The Court ordered that Plaintiffs file a formal motion to consolidate and stipulation within 14 days, file a consolidated complaint within 60 days of the ruling on the motion to consolidate, and that Defendant shall then have 60 days to file its motion to dismiss, Plaintiffs shall have 45 days to respond, and Defendant shall have 30 days to reply (*Id.*);

WHEREAS, on September 1, 2022, Plaintiffs filed their Unopposed Motion to Consolidate Cases (Dkt. No. 44);

WHEREAS, on September 2, 2022, Plaintiffs filed their Stipulation to Appoint Interim Counsel Pursuant to Fed. R. Civ. P. 23(g) (Dkt. No. 45), and on September 7, 2022, this Court granted that stipulation (Dkt. No. 46);

WHEREAS, September 16, 2022, the Parties, via stipulation, requested that the Rule 26(f) Conference and related deadlines be continued (Dkt. No. 52), and on September 19, 2022, this Court granted that stipulation (Dkt. No. 53).

WHEREAS, on September 22, 2022, this Court granted Plaintiffs’ Motion to Consolidate Cases (Dkt No. 54);

WHEREAS, on November 7, 2022, Plaintiffs filed their Consolidated Class Action Complaint (“CAC”) (Dkt. No. 57);

WHEREAS, on December 6, 2022, this Court entered a scheduling order as follows (Dkt. No. 59):

<b>Jury Trial</b>	<b>April 30, 2024 at 8:30 a.m.</b>
File Findings of Fact and Conclusions of Law	April 23, 2024
<b>Final PreTrial Conference</b>	<b>April 15, 2024 at 11:00 a.m.</b>
File PreTrial Documents	not later than April 8, 2024
File motions in limine	not later than March 18, 2024
<b>Discovery Cut-off</b>	<b>August 15, 2023</b>
<b>Expert Discovery Cut-off</b>	<b>November 17, 2023</b>
Initial disclosure of Experts	not later than September 15, 2023
Rebuttal disclosure of Experts	not later than October 16, 2023
<b>Class Certification Motion Hearing</b>	<b>September 25, 2022 at 1:30 p.m.</b>
Motion for Class Certification	not later than June 30, 2023
Defendant's Opposition	not later than August 4, 2023
Plaintiff's reply	not later than September 1, 2023
<b>Summary Judgment Motions</b>	<b>February 26, 2024 at 1:30 p.m.</b>
Motions for Summary Judgement	not later than December 8, 2023
Oppositions	not later than January 12, 2024
Replies	not later than February 2, 2024
<b>Settlement Discussions</b>	<b>not later than April 30, 2023</b>
Joint Report on Settlement Discussions	within 7 days of settlement discussions

WHEREAS, Defendant filed its Motion to Dismiss Plaintiffs' CAC on January 6, 2023 (Dkt. No. 61), Plaintiffs opposed the Motion on February 21, 2024 (Dkt. No. 75), and Defendant replied in support of its Motion on March 22, 2023 (Dkt. No. 77);

WHEREAS, on April 19, 2023, this Court entered an order granting in part and denying in part as moot Defendant's Motion to Dismiss on the basis that Plaintiffs lacked standing and granted Plaintiffs 21 days to amend (Dkt. No. 79);

WHEREAS, the effect of this order was to dismiss all claims;

WHEREAS, the Parties have met and conferred and further agree and hereby stipulate, subject to the Court's order, that; (i) Plaintiffs' Amended Consolidated Complaint be filed by June 5, 2023; (ii) Defendant will move to dismiss by July 20, 2023; (iii) Plaintiffs will oppose by September 4, 2023; and (iv) Defendant will reply by October 4, 2023;

1           WHEREAS, the Parties hereby stipulate, in light of the Court's motion-to-  
 2 dismiss Order and subject to approval by the Court, that all other case deadlines are  
 3 taken off calendar, and the Parties will submit a joint status report with a proposed  
 4 case schedule within 30 days from the entry of the Court's order on Defendant's  
 5 Renewed Motion to Dismiss, to the extent the Court determines any claims are  
 6 sufficiently pleaded.

7           ACCORDINGLY, the undersigned Parties stipulate, and request that the Court  
 8 order, the schedule be set as follows:

9           Plaintiffs' Amended Consolidated Complaint	June 5, 2023
10          Defendant's Renewed Motion to Dismiss	July 20, 2023
11          Plaintiffs' Opposition to Motion to Dismiss	September 4, 2023
12          Defendant's Reply In Support of Motion to Dismiss	October 4, 2023
13          Parties meet and confer on the appropriateness of engaging in a mediation	November 20, 2023

14           All other case deadlines are taken off the calendar, and the Parties will submit  
 15 a joint status report with a proposed case schedule within 30 days from the entry of  
 16 the Court's order on Defendant's Renewed Motion to Dismiss.

17  
 18           IT IS SO STIPULATED.

19  
 20           DATED: April 27, 2023

Respectfully submitted,

21           **KAPLAN FOX & KILSHEIMER LLP**

**KIRKLAND & ELLIS LLP**

22           By: /s/ Matthew B. George  
                   Matthew B. George

By: /s/ Devin S. Anderson  
                   Devin S. Anderson

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*Interim Co-Lead Class Counsel for  
Plaintiffs*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Matthew B. George, attest that concurrence in the filing of this document has been obtained from the other signatory.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of April, 2023, at San Diego, California.

/s/ Matthew B. George  
Matthew B. George